

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

SELWYN KARP, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

FIRST CONNECTICUT BANCORP, INC.,
JOHN J. PATRICK, JR., RONALD A.
BUCCHI, JOHN A. GREEN, JAMES T.
HEALEY JR., PATIENCE P. MCDOWELL,
KEVIN S. RAY, and MICHAEL A. ZIEBKA,

Defendants.

Case No.: 1:18-cv-02496-RDB

**STIPULATION AND [PROPOSED] ORDER REGARDING WITHDRAWAL OF
PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION AS MOOT AND
THE ANTICIPATED AMENDED PLEADING AND BRIEFING SCHEDULE
THERE TO**

WHEREAS, on August 14, 2018, Plaintiff Selwyn Karp ("Plaintiff") filed his putative class action in the above captioned action (the "Complaint") (ECF #1);

WHEREAS, on September 4, 2018, Plaintiff caused a notice providing members of the purported plaintiff class with the information required to the Private Litigation Reform Act of 1995 ("PSLRA") (15 U.S.C. § 78u-4(a)(3)(A)) setting a deadline to move for lead plaintiff appointment by November 2, 2018;

WHEREAS, pursuant to the PSLRA (15 U.S.C. § 78u-4(a)(3)(B)), the Court must appoint a lead plaintiff in this action and approve lead plaintiff's selection of lead counsel;

WHEREAS, Plaintiff's counsel anticipates that, after the appointment of lead plaintiff and approval of lead plaintiff's selection of lead counsel, the lead plaintiff will file an amended complaint;

WHEREAS, upon filing of an amended complaint, Defendants' counsel anticipates filing a motion to dismiss;

WHEREAS, the parties believe that, for reasons of judicial efficiency and economy, Defendants should be permitted to withhold responding to the Complaint until after a lead plaintiff is appointed and lead plaintiff's selection of counsel is approved, and such lead plaintiff files an amended complaint, if any;

WHEREAS, on September 14, 2018, Plaintiff also filed a Motion for Preliminary Injunction (the "Injunction Motion") to enjoin the special meeting of First Connecticut Bancorp, Inc. shareholders scheduled for September 25, 2018 (ECF # 13), which has now passed and thus the Injunction Motion is moot;

WHEREAS, the parties have met and conferred on the aforementioned and propose the withdrawal of the Injunction Motion as moot and the below schedule to govern this action;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel for each of the parties hereto as follows:

- 1) Plaintiff hereby withdraws his Injunction Motion as moot;
- 2) Defendants are no longer required to file any briefs in response to the Injunction Motion and Plaintiff's request for a hearing is hereby vacated;
- 3) Plaintiff's anticipated amended complaint, if any, will be due within 30 days after the appointment of a lead plaintiff and approval of lead plaintiff's selection of lead counsel;
- 4) Defendants' answer or response shall be due within 60 days after the filing date of Plaintiff's amended complaint;
- 5) Plaintiff's opposition if defendants file a motion to dismiss shall be due within 30

days of the filing of date of Defendants' motion to dismiss;

- 6) Defendants' reply brief to a motion to dismiss, if any, shall be due within 15 days of the filing date of Plaintiff's opposition brief; and

DATED: September 26, 2018

ALSTON & BIRD

/S/

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Attorneys for Plaintiff

IT IS SO ORDERED this _____ day of _____, 2018

Honorable Richard D. Bennett